

Karen L. Willis, J.D.
220 West G Street, Suite E.
San Diego, CA. 92101
(619) 206-5311

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VIA EMAIL

The Hon. Judge Cathy Seibel
300 Quarropas St., Courtroom 621
White Plains, NY 10601-4150

REQUEST FOR EXTENSION TO FILE AMENDED COMPLAINT

Dear Hon. Judge Seibel:

I am the Intervenor in the case of Can't Stop v. Sixuvus. I do hereby request an extension of time in which to file an amended complaint in intervention for the following reason: A Writ of Mandamus into the Second Circuit Court of Appeal is being filed on or before Friday August 23, 2019 which relate to the operative initial complaint and its associated Emergency Motion for Temporary Restraining Order dated March 15, 2018.

It occurred to me today that should I amend my complaint in intervention as scheduled, this act may render any decision by the Court of Appeal moot as to the complaint and its associated Order granted on March 16, 2018. In any event, amending the complaint may deprive the Court of jurisdiction over the matter.

As your honor is aware, I sought clarification of the March 16, 2018 Order based on newly discovered information from Facebook which I maintained brings into question whether the Sixuvus actually complied with the Order. In addition, whether

the Sixuvus can continue their administration and control of official and verified Village People content; including LIKES in contravention of their right to do so being terminated in 2017. I believe the Court of Appeal is in the position to ultimately resolve this question.

Moreover, at the request of the Sixuvus counsel (Sarah Matz), the court directly clarified the Order on the record during the July 18, 2019 status conference. The Court's reasoning behind it's denial of my request to enjoin the Sixuvus from any further use of Village People's verified Facebook page, now referred to as the Kings of Disco, is substantially the basis for the Writ.

Accordingly, an extension of time in which to file an amended complaint, until a decision from the Court of Appeal, is hereby requested.

Respectfully submitted,



Karen L. Willis